

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re: ) Chapter 7  
JACK CARLTON CRAMER JR., ) Bankruptcy No. 18-13383  
Debtor(s). ) STIPULATED MOTION FOR AN  
ORDER DECLARING DEED OF  
TRUST UNENFORCEABLE

COME NOW 21<sup>st</sup> Mortgage Corporation (“21<sup>st</sup> Mortgage”), through counsel, Tomasi Salyer Martin, and Eleanor A. DuBay, and the duly appointed trustee, Edmund J. Wood, through counsel, The Livesey Law Firm, and Rory C. Livesey, and stipulate as follows:

21<sup>st</sup> Mortgage is the beneficiary of that deed of trust dated December 22, 2000, and recorded in the records of King County, Washington on December 28, 2000, under recording number 20001228001193 against the real property of the estate located at 15605 - 63<sup>rd</sup> Avenue N.E., Kenmore, Washington 98028, and legally described as

Lot 1 in Block 3 of Inglewoods No. 2, as per plat recorded in Volume 54 of Plats, Pages 30 and 31, Records of King County Auditor;

Situate in the City of Kenmore, County of King, State of Washington.

21<sup>st</sup> Mortgage and the trustee stipulate that the obligation secured by that deed of trust is unenforceable due to the passage of time and the deed of trust is not an encumbrance against the property.

This stipulation does not affect the judgment in favor of 21<sup>st</sup> Mortgage filed under recording number 20160802000179, and as set forth in Proof of Claim No. 4 filed in this proceeding, the allowance and payment of which will be subject to further order of the court.

RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of April, 2020.

TOMASI SALYER MARTIN

/S/ Eleanor A. DuBay

Eleanor A. DuBay, WSBA #45828  
Attorney for 21<sup>st</sup> Mortgage Corporation

RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of April, 2020.

THE LIVESEY LAW FIRM

/S/ *Rory C. Livesey*

Rory C. Livesey, WSBA #17601  
Attorney for Edmund J. Wood, Trustee

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